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Attorney For Plaintiff ,

UNITED STATES DISTRICT COURT
DISTRICT OF CALIFORNIA

HOLLY CASH,

Plaintiff,

v.

HISAGO; ANGELA Y. LAM, Trustee of
the GENE and ANGELA LAM 2003 Trust
dated June 19, 2003,

Defendants.

CASE NO.3:14-cv-00686-LB

**STIPULATION OF DISMISSAL
AND ~~PROPOSED~~ ORDER
THEREON**

The parties, by and through their respective counsel, stipulate to dismissal of this action in its entirety with prejudice pursuant to Fed.R.Civ.P.41(a)(2). Outside of the terms of the Settlement Agreement and General Release (“Agreement”) herein, each party is to bear its own costs and attorneys’ fees. The parties further consent to and request that the Court retain jurisdiction over enforcement of the Agreement. *See Kokonen v. Guardian Life Ins. Co.*, 511 U.S. 375 (1994) (empowering the district courts to retain jurisdiction over enforcement of settlement agreements).

1 Therefore, IT IS HEREBY STIPULATED by and between parties to this
2 action through their designated counsel that the above-captioned action become
3 and hereby is dismissed with prejudice pursuant to Federal Rules of Civil
4 Procedure 41(a)(2).

5 This stipulation may be executed in counterparts, all of which together
6 shall constitute one original document.

7
8 Dated: December 3, 2014

THOMAS E. FRANKOVICH
A PROFESSIONAL LAW CORPORATION

9
10 By: /s/ Thomas E. Frankovich
11 Thomas E. Frankovich
12 Attorney for Plaintiff HOLLY CASH

13 Dated: December 3, 2014

ROCHESTER, WONG & SHEPARD, A P.C.

14
15 Permission to use
electronic signature
given on 12/3/2014

16 By: /s/ William R. Sheppard
17 William R. Shepard
18 Attorney for Defendants HISAGO; ANGELA Y.
LAM, Trustee of the GENE and ANGELA LAM
2003 Trust dated June 19, 2003

19
20 **ORDER**

21 IT IS HEREBY ORDERED that this matter is dismissed with prejudice pursuant to
22 Fed.R.Civ.P.41(a)(2). IT IS FURTHER ORDERED that the Court shall retain jurisdiction for
23 the purpose of enforcing the parties' Settlement Agreement and General Release should such
24 enforcement be necessary

25 Dated: December 8, 2014

26
27 
28 Honorable Magistrate Laurel Beeler
UNITED STATES DISTRICT JUDGE